



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7 25 FUNSTON ROAD KANSAS CITY, KANSAS 66115

JUL 26 1984

MEMORANDUM

Re-inspection at Reid Supply Company, Wichita, Kansas SUBJECT:

to Determine Compliance with State Order (RCRA)

FROM:

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Environmental Engineer, EMCM/ENSV

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Environmental Scientist, AWCM/ARWM

THRU:

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On July 16, 1984, I accompanied Dale Stuckey on a follow-up inspection of Reid Supply Company in Wichita, Kansas. This inspection was conducted to determine the facility's compliance with an Administrative Order issued by the Kansas Department of Health and Environment on June 1, 1984. The following summarizes the findings of this inspection:

- 1. Reid is currently working with the Wichita Fire Department to obtain a waiver of the buffer zone requirements for flammable liquid storage. It is not yet known if or when this waiver will be granted.
- 2. Listings of emergency equipment have been attached to all copies of the contingency plan maintained at the facility. The contingency plan has now been submitted to all necessary local authorities. Reid is currently revising the contingency plan to address concerns of the Wichita Fire Department.
- 3. Reid has made arrangements for obtaining emergency equipment for use in the event of a major spill. Backup arrangements are in the process of being made.
- 4. Emergency communication and alarm equipment have been obtained and installed by Reid. This equipment was tested and verified as functional.
- 5. Reid has removed all but 15 drums of waste from the rear of the north plant. These drums have been identified as radioactive and will be disposed of as soon as disposal arrangements are complete. The 15 drums have been overpacked, are raised on pallets and were covered with a tarp.

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- 6. Almost all drums of waste have been removed from the drum processing area at the south plant. The drums that remain are in the process of being prepared for disposal.
- 7. All drums of waste have been removed from in front of the drum storage warehouse. The drums inside of the drum storage warehouse are stacked in quantities of 12 or less with adequate aisle spacing maintained.
- 8. The facility has modified the facility inspection log so that all inspection entries can be signed and dated.
- 9. A manifest had been observed during the previous inspection which had not been signed by Reid as the receiving facility. This manifest had been completed and a copy sent to the generator.
- 10. All wastes currently blended into a fuel mixture by Reid have been tested and have a heat value exceeding 8,000 BTUs per pound.
- 11. The facility has revised and updated their closure cost estimate. A letter of credit has been prepared to meet the financial assurance requirements and has been submitted to State officials. This letter of credit lists the KDHE as beneficiary.
- 12. Overall, the Reid facility appeared much improved in comparison to conditions observed during the last inspection. The drum inventory had been reduced to below 500. Several deficiencies were noted by the State inspector. These are as follows:
- A. Several open drums were observed at the drum processing area. It appeared that these drums had been left open by facility workers when they left the work area upon the arrival of the inspection team.
- B. Several rusted and/or dented drums were observed in the drum storage warehouse. None of these drums appeared to be in imminent danger of leaking.
- C. Two fire extinguishers in the drum storage warehouse had not been inspected for over one year.
- D. A slight oil sheen was observed in rainwater run-off from the drum processing area.
- 13. Reid is in the process of renting a building which will house a tire shredding operation. This building is located east of the drum processing area. No tires are being stored inside of the hazardous waste drum storage warehouse, although a mound of tires was observed in the field south of the warehouse.

14. A written report of this inspection is to be completed by the State inspector. In addition, a letter is to be sent to Reid requesting that all deficiencies noted during this inspection be corrected.